Meeting Agenda - Tuesday, November 19, 2019

Arizona Supreme Court -1501 West Washington Street
Phoenix, Arizona 85007 – 3:00 P.M. Conference Room 109
General Inquiries Call: 602-452-3378 (Certification and Licensing Division Line)
Members of the public may attend meeting in person.

For any item listed on the agenda, the Board may vote to go into Executive Session for advice of counsel and/or to discuss records and information exempt by law or rule from public inspection, pursuant to the Arizona Code of Judicial Administration, Code Section 1-202(C).

| CALL | TO C | PRDERDeborah Primock, Chair | |
|------|--|---|--|
| 1) | REVIEW AND APPROVAL OF MINUTESDeborah Prim | | |
| | 1-A: | Review, discussion and possible action regarding the regular session minutes of the meeting held on September 5, 2019. | |
| 2) | PENDING COMPLAINTS | | |
| | 2-A: | Review, discussion and possible action regarding complaints 17-0027 and 17-0028 involving license holders Jeannean and Nicole Sabatina. | |
| | 2-B: | Review, discussion and possible action regarding complaint 17-0023 involving | |

license holder James Otis.

- 2-C: Review, discussion and possible action regarding complaint 19-0005 involving license holder Dawn Walters.
- 2-D: Review, discussion and possible action regarding complaint 16-0014 and 16-0015 involving license holders Jason Cobb and Compass Fiduciary Group.
- 2-E: Review, discussion and possible action regarding complaint 18-0038 involving license holder Leslie Mann-Damon.
- 2-F: Review, discussion and possible action regarding complaint 18-0050 involving license holder Custom Care & Financial Solutions.
- 2-G: Review, discussion and possible action regarding complaint 18-0058 and 18-0059 involving license holders Jane Geisler and Managed Protective Services.
- 2-H: Review, discussion and possible action regarding complaint 18-0003, 18-0004 and 18-0005 involving license holders Childers & Coventry, LLC, Donal Childers and Roger Coventry.

| 3) INIT | INITIAL LICENSURE AND ELIGIBILITYDivision Staff | | | | | |
|-------------------------------|--|------------|---------------------------------------|--|--|--|
| 3-A: | Review, discussion and possible action regarding the following applications for initial individual and business licensure: | | | | | |
| | 1. Sidney Brimhall | | | | | |
| | Taylor Galas Brendalee Littlejohn | | | | | |
| | 4. Phillip Peek | | | | | |
| | 5. Devin Brown | | | | | |
| | 6. Meher Services, LLC | | | | | |
| | 7. Amy Goodwin | | | | | |
| 4) REN | RENEWAL CERTIFICATION APPLICATIONS | | | | | |
| 4-A: | 4-A: Review, discussion and possible action regarding the following applications for renewal of individual and/or business entity licensure: | | | | | |
| | 1. Braddock, Lori | 10. | Paz, Sandra | | | |
| | 2. Crosby, Elizabeth | 11. | • | | | |
| | 3. Flores, Patricia | 12. | | | | |
| | 4. Fuss, Charles | 13. | • | | | |
| | 5. Goldman, Ronald | 14. | | | | |
| | 6. Goldman, Jennifer | 15. | | | | |
| | 7. Holcomb, Sarah | | Compass Fiduciary Jane Anne Geisler | | | |
| | Hoover, Taryn Lauro, Christina | 17. 18. | | | | |
| | 9. Lauro, Christina | 10. | ivialiaged i fotective services, inc. | | | |
| 5) LICE | LICENSURE AND ELIGIBILITY | | | | | |
| 5-A: | | | | | | |
| 5-B: | 5-B: Review, discussion, and possible action regarding the request to retake the Fiduciary Program Examination from the following individuals: | | | | | |
| | 1. Antoinette Nelson | | | | | |
| | 2. Lorena Velasquez | | | | | |
| CALL TO T | THE PUBLIC | ********* | Deborah Primock, Chair | | | |
| ADJOURNDeborah Primock, Chair | | | | | | |

Agenda Summary - Tuesday, November 19, 2019

1) REVIEW AND APPROVAL OF MINUTES

1-A: Review, discussion and possible action regarding the regular session minutes of the meeting held on September 5, 2019.

A draft of the regular session minutes for the meeting of September 5, 2019, has been provided for the Board's review and consideration.

Agenda Summary - Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-A: Review, discussion and possible action regarding complaints 17-0027 and 17-0028 involving license holders Jeannean and Nicole Sabatina.

Pursuant to Arizona Code of Arizona Code of Judicial Administration ("ACJA") §7-201(H)(1)(b), on or about October 25, 2017, a Director Initiated Complaint was initiated against Arizona licensed fiduciaries, Jeannean Sabatina and Nicole Sabatina.

On July 12, 2018 the Board voted to accept the findings of the Probable Cause Evaluator and accepted staff's recommendation to revoke the licenses of Jeannean and Nicole Sabatina ("Sabatina's").

On July 19, 2018, the Board filed the Notice of Formal Statement of Charges in both complaints with the Presiding Disciplinary Judge. Division records demonstrate on August 1, 2018, service was accepted by counsel for the Sabatinas. Counsel for the Sabatinas filed a Request for Hearing and a hearing was held in February of 2019.

On November 15, 2019, Judge O'Neil issued an Order recommending the Board affirm its decision to revoke the licenses of Jeannean Sabatina and Nicole Sabatina.

Staff recommends the Board enter a Final Order revoking the licenses of Jeannean Sabatina and Nicole Sabatina. Staff also recommends all other open complaints involving the Sabatinas be held in abeyance.

Agenda Summary – Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-B: Review, discussion and possible action regarding complaint 17-0023 involving license holder James Otis.

Complainant filed complaint number 17-0023 alleging licensed fiduciary James Otis, who was appointed personal representative of her mother's estate, failed to properly perform his duties by, among other things: (1) poor communication and non-responsiveness; (2) rudeness; (3) failure to prepare and list real property for sale; (4) acting against the complainant's (who was the sole beneficiary) stated interests by listing and attempting to sell the estate real property against the Complainant's wishes; (5) failure to properly value the real property and failure to protect the real property from damage; (6) failure to act as directed by the will concerning the distribution of personal property; (7) failure to pay the mortgage and property taxes on estate property; (8) failure to follow up with Chase bank about the theft of money; (9) wasting estate assets; (10) failure to provide the sole beneficiary and subsequent personal representative with all requested documents and records; (11) filing an erroneous pleading with the Court and failing to correct it; (12) overbilling and untruthful billing; billing for services not of value to the estate; and (13) creating an appearance of a conflict of interest where Mr. Otis failed to consider using a different realtor upon Complainant's request and upon obtaining an appraisal that suggested the house had been undervalued.

As detailed in the investigation report, staff substantiated the following allegations:

- 1. Poor communication, non-responsiveness.
- 2. Poor communication, rudeness.
- 3. Issues related to listing the estate real property including the timing of the initial listing agreement, the value assigned to the home in the listing agreement, poor listing photographs and the lack of information provided to Complainant prior to the listing.
- 4. Acting against the sole beneficiary's stated interests where Mr. Otis listed and attempted to sell the estate real property against the sole beneficiary's wishes.
- 5. Acting contrary to the best interest of the estate by preparing to sell the estate real property for \$30,000 less than its appraised value, leaving a window at the estate property open during monsoon season; paying a bill (for attorney fees) over the sole beneficiary's objection and Mr. Otis paying himself a portion of his claimed fees prior to providing the sole beneficiary an invoice.
- 6. Failing to act as directed by the Will, including ensuring that the sole beneficiary obtained property gifted to her by the Will (a sewing machine and Oldsmobile Alero).
- 7. (unsubstantiated)

- 8. Wasting estate assets, including by changing locks on the estate property within thirty (30) days of the date the sole beneficiary changed the locks; obtaining an appraisal of personal property valued at less than the cost of the appraisal; and paying for attorney fees to help "completion of the estate administration" after having been asked to withdraw.
- 9. Failing to provide the sole beneficiary and subsequent PR all requested documents and records.
- 10. Filing an erroneous pleading with the Court and failing to correct it.
- 11. Overbilling and untruthful billing; billing for services not of value to the estate.
- 12. (unsubstantiated)
- 13. Creating an appearance of a conflict of interest where Mr. Otis failed to consider using a different realtor upon Complainant's request and upon obtaining an appraisal that suggested the house had been undervalued.

As noted above, allegations 7 and 12 were unsubstantiated.

Recommendation:

This Investigation Summary was presented to the Probable Cause Evaluator who determined that probable cause exists that Mr. Otis committed the violations described in allegations 1 through 6, 8 through 11 and 13. The Probable Cause Evaluator further determined that probable cause does not exist that Mr. Otis committed the violations described in allegations 7 and 12. Staff recommends that the Board accept the determinations of the Probable Cause Evaluator and issue a Censure.

Agenda Summary - Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-C: Review, discussion and possible action regarding complaint 19-0005 involving license holder Dawn Walters.

In May of 2014, Ms. Walters was appointed permanent Guardian and Conservator for a ward ("TD"). TD had been deemed incapacitated and incompetent to stand trial for a criminal matter in 2006. TD, of his own volition, resides alone on a parcel of land he owns in Rainbow Valley, Arizona, located approximately 20 miles south of Avondale and 20 miles east of Buckeye, Arizona. By all accounts, TD seldom leaves his residence, has no driver's license and relies on friends and neighbors to provide him with the majority of his food, water and clothing.

Two third party individuals (the "complainants") have befriended TD over several years. The complainants live near TD in Rainbow Valley, Arizona. The complainants had volunteered to ensure TD had what he needed including food, water and other personal items. There is no formal agreement concerning complainants' assistance and they receive no compensation from the fiduciary for performing the service. Since initially volunteering, complainants now allege that Ms. Walters is not meeting TD's needs.

Generally, TD's needs appear to have been met to TD's satisfaction with this volunteer arrangement.

Ms. Walters said she had never had any adversarial issues or dealings with complainants until recently. Apparently, as a result of the adversarial issues and other issues Ms. Walters caused a protective order to be issued prohibiting complainants contact with TD. Not withstanding the protective order, the complainants continue to assist TD with his needs believing such assistance is necessary.

The complaint details six allegations of misconduct. The investigation unsubstantiated five of the allegations. The investigation substantiated allegation one finding that Ms. Walters has not satisfactorily worked with the complainants or some other third party for the provision of TD needs. While the complainants are volunteers and are willing to assist, the investigation found that they do not believe Ms. Walters is as engaged in the process as necessary. In addition, given the protective order, Ms. Walters' conduct of allowing the complainants to continue providing assistance demonstrates she is comfortable with that assistance, but has failed to reach out and formalize any arrangement instead relying on the complainants' volunteerism or feeling of obligation.

Recommendation:

This matter was presented to the Probable Cause Evaluator who determined that probable cause exists that Ms. Walters committed the alleged act(s) of misconduct described in allegation 1, but that probable cause does not exist for allegations 2 through 6. Staff recommends that the Board accept the findings of the Probable Cause Evaluator and issue the sanctions as described in the Investigation Summary and Probable cause Analysis Report.

Agenda Summary - Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-D: Review, discussion and possible action regarding complaint 16-0014 and 16-0015 involving license holders Jason Cobb and Compass Fiduciary Group.

On June 6, 2014, Complainant's husband died and left behind a large estate. On October 30, 2014, the Court assigned Compass Fiduciary Group LLC c/o Jason Cobb, ("Compass") to administer the estate.

The estate included at least (15) individual business ventures, one of which was a jewelry business, numerous properties including several parcels of acreage both commercial and residential, multiple parcel lots in Navajo County, Arizona, a parcel in Kingman, Arizona, a trailer park in Apache Junction, Arizona and several parcels of land in Bonner County, Idaho. Pictures of estate property demonstrate that it was a large estate. In addition, there is no dispute that the decedent's record keeping was problematic.

There were two primary beneficiaries of the estate, Complainant and the decedent's daughter. The management of the estate was complicated by conflict between the two beneficiaries.

The complaint contained four allegations:

Allegation 1: Despite repeated requests, fiduciary failed to provide inventories & accountings of estate administration.

Allegation 2: Failure to properly care for assets & property of the estate. Items of estate include art, vehicles, and property of value in non-climate-controlled storage lockers for a 2-year period.

Allegation 3: Failure to timely appraise and sell real property of the estate inclusive of residential, commercial, and vacant parcels of land that were owned by the decedent.

Allegation 4: Refusal to distribute assets of the estate after a settlement conference & agreement was made between the beneficiaries and their respective counsel in the State Court of Appeals on September 29, 2016.

As detailed in the Investigation Summary and Probable Cause Analysis, staff substantiated the Allegation 1 that inventories were not timely completed. Staff also substantiated Allegation 2 that certain property was not properly cared for. Staff did not substantiate Allegations 3 and 4.

Recommendation:

The Investigation Summary and Probable Cause Analysis was presented to the Probable Cause Evaluator who determined that probable cause exists that Jason Cobb and Compass Fiduciary Group, LLC have committed the alleged act(s) of misconduct described in Allegations 1 and 2. The Probable Cause Evaluator also determined that probable cause does not exist as to Allegations 3 and 4. Staff recommends the Board accept the determination of the Probable Cause Evaluator and issue a Letter of Concern.

Agenda Summary – Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-E: Review, discussion and possible action regarding complaint 18-0038 involving license holder Leslie Mann-Damon.

Complainant in this case has been diagnosed with various cognitive issues and currently has a conservatorship and co-guardianship (along with complainants' son) with Mann-Damon. Complainant feels the guardianship/conservatorship are unnecessary and alleges Mann-Damon:

- 1. Refuses to provide financial statements.
- 2. Has engaged in unprofessional conduct by gossiping about the complainants' medical situation to others.
- 3. Has engaged in unprofessional conduct by interfering with the complainants' physician visits by providing inaccurate and misleading information.
- 4. Denied the complainant access to her inhaler.
- 5. Charged excessive fees.

The matter was investigated and on October 7, 2019, PC Evaluator Mike Baumstark determined PC did not exist as to the allegation.

Recommendation:

It is recommended the Board accept the finding of the Probable Cause Evaluator and enter a finding Leslie Mann-Damon has not committed the alleged act(s) of misconduct as detailed in Allegations 1, 2, 3, 4 & 5 of the Investigation Summary and Allegation Analysis Report in complaint number 18-0038.

It is further recommended the Board dismiss complaint 18-0038.

Agenda Summary - Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-F: Review, discussion and possible action regarding complaint 18-0050 involving license holder Custom Care & Financial Solutions.

Complainant in this case managed an assisted living facility which housed a ward under guardianship/conservatorship with Custom Care & Financial Solutions ("CCFS") (Philip DoVico). Complainant alleges;

- 1. CCFS has consistently been late with the wards' rent payment.
- 2. CCFS has refused hospice care despite evidence of its necessity.
- 3. CCFS has refused to communicate with the complainant.

The matter was investigated and submitted to the Probable Cause Evaluator who determined PC does not exist to the allegations.

Recommendation:

It is recommended the Board accept the finding of the Probable Cause Evaluator and enter a finding CCFS has not committed the alleged act(s) of misconduct as detailed Allegation 1, 2 and 3 of the Investigation Summary and Allegation Analysis Report in complaint number 18-0050.

It is further recommended the Board dismiss complaint 18-0050.

Agenda Summary - Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-G: Review, discussion and possible action regarding complaint 18-0058 and 18-0059 involving license holders Jane Geisler and Managed Protective Services.

After the death of a ward in 2017, Managed Protective Services ("MPS") searched for additional family members/beneficiaries of her estate and located the sole beneficiary (complainant Loni Young) previously thought to be deceased. Young was infuriated Jane Geisler ("Geisler") didn't contact him sooner and alleges Geisler:

- 1. Failed to do due diligence in locating him.
- 2. Failed to pursue legal actions against perpetrators of trust assets.
- 3. Failed to provide financial statements to the complainant.
- 4. Failed to notify the complainant of court proceedings.
- 5. Unnecessarily delayed closing the estate thereby dwindling estate assets.
- 6. MPS charged the estate for responding to the earlier AOC complaint

The matter was investigated and submitted to the Probable Cause Evaluator who ultimately determined that PC does exist for allegations 3, 4 and 6 and does not exist for allegations 1, 2 and 5.

Recommendation:

It is recommended the Board accept the finding of the Probable Cause Evaluator and enter a finding Jane Geisler and MPS have not committed the alleged act(s) of misconduct as detailed in Allegations 1, 2 and 5 of the Investigation Summary and Allegation Analysis Report in complaint number 18-0058 and 18-0059.

It is recommended the Board accept the finding of the Probable Cause Evaluator and enter a finding Jane Geisler and MPS have committed the alleged act(s) of misconduct as detailed in Allegations 3, 4 and 6 of the Investigation Summary and Allegation Analysis Report in complaint number 18-0058 and 18-0059.

It is further recommended the Board enter a finding grounds for informal disciplinary action exists pursuant to Arizona Code of Judicial Administration ("ACJA") § 7-201(H)(6) for act(s) of misconduct involving A.R.S. § 14-5419 and ACJA § 7-202(J)(5)(m) for failure to provide financial statements; A.R.S. §§ 14-1401 and 14-5419 for failure to provide notice of hearings; and for charging the estate for responding to a complaint filed with the Division.

If further recommended the Board issue a Letter of Concern.

Agenda Summary - Tuesday, November 19, 2019

2) PENDING COMPLAINTS

2-H: Review, discussion and possible action regarding complaint 18-0003, 18-0004 and 18-0005 involving license holders Childers & Coventry, LLC, Donal Childers and Roger Coventry.

Complainant and her brother were involved in highly contested trust asset distributions which ultimately necessitated court intervention. Childers & Coventry (C&C) were appointed as successor trustee and the complainant alleges C&C:

- 1. Showed favoritism to complainants' brother with respect to asset distribution.
- 2. Failed to provide full disclosure of the trust to Jean Hansen as final beneficiary.
- 3. Received payment of fees from the trust for non-trust related work.
- 4. Failed to follow court orders regarding trust procedures.
- 5. Mismanaged trust assets.
- 6. Failed to timely administer the estate.

The matter was investigated and submitted to the Probable Cause Investigator who determined PC does not exist as to the allegations.

Recommendation:

It is recommended the Board accept the finding of the Probable Cause Evaluator and enter a finding Donal Childers, Roger Coventry and Childers & Coventry have not committed the alleged act(s) of misconduct as detailed Allegation 1 through 6 of the Investigation Summary and Allegation Analysis Report in complaint number 18-0003,18-0004 and 18-0005.

It is further recommended the Board dismiss complaints 18-0003,18-0004 and 18-0005.

Agenda Summary - Tuesday, November 19, 2019

3) INITIAL LICENSURE AND ELIGIBILITY

3-A: Review, discussion and possible action regarding the following applications for initial individual and business licensure.

The following applicants applied for initial individual licensure. They have submitted completed applications demonstrating they meet the minimum eligibility requirements for licensure. No information has been presented or obtained during the background check which would preclude licensure. The applicants have completed the required fiduciary professional training.

The Division recommends approval of initial individual entity fiduciary licensure for the following applicants:

- 1. Sidney Brimhall
- 2. Taylor Galas
- 3. Brendalee Littlejohn
- 4. Phillip Peek
- 5. Devin Brown
- Meher Services LLC
- 7. Amy Goodwin applied for initial fiduciary licensure. The applicant successfully passed the program examination and has submitted a complete application demonstrating that she meets the minimum education and experience requirements. The applicant has also attended the fiduciary professional training. Ms. Goodwin disclosed several civil cases that she was involved in. Majority of these cases revolved around family and civil judgment matters. In 2004 Ms. Goodwin's husband was involved in a criminal matter which Ms. Goodwin stated had severely negatively impacted her life, personally and financially.

During the background check it was further revealed through fingerprint results that Ms. Goodwin was convicted of a 2006 misdemeanor for driving with a suspended license and for failing to appear in court. Ms. Goodwin stated that she had failed to disclose this matter because she thought she read in the application that she did not have to disclose traffic matters.

Ms. Goodwin stated that she had been going through a rough patch between the years 2004-2008 and was able to turn it around. Since than Ms. Goodwin enrolled in school and was able to get her associates degree and has established stable employment working for the Maricopa County Public Fiduciary with raving reviews from her supervisors and coworkers.

Division recommends approval of initial individual entity fiduciary licensure for Amy Goodwin with the standard non-disclosure language.

Agenda Summary - Tuesday, November 19, 2019

4) RENEWAL CERTIFICATION APPLICATIONS

4-A: Review, discussion and possible action regarding the following applications for renewal of individual and/or business entity Fiduciary certification:

The following individual license holders and business entities have submitted applications for renewal of standard licensure. The applications are complete, no information has been presented during a background review which is contrary to renewal of standard licensure being granted and the license holders have demonstrated they meet the minimum eligibility requirements for renewal of standard licensure. It is recommended renewal of standard licensure be granted to the following individuals:

| 1. | Braddock, Lori | 8. | Hoover, Taryn |
|----|-------------------|-----|-------------------------------------|
| 2. | Crosby, Elizabeth | 9. | Lauro, Christina |
| 3. | Flores, Patricia | 10. | Paz, Sandra |
| 4. | Fuss, Charles | 11. | Integrated Fiduciary Services, Inc. |
| 5. | Goldman, Ronald | 12. | Arizona Elder Care, LLC |
| 6. | Goldman, Jennifer | 13. | Stubler Fiduicary Services LLC |
| 7. | Holcomb, Sarah | 14. | Mark Sanelli |

- 15. Jason Cobb
- 16. Compass Fiduciary

Jason Cobb applied for renewal of certification for himself and his business Compass Fiduciary. Staff performed a background investigation which revealed Mr. Cobb did not disclose a civil case CV2016-054764. The case was a complaint by a ward that was resolved when the plaintiff (ward) did not file a response to a Motion for Summary Judgment.

It is recommended renewal of standard licensure be granted to Jason Cobb and Compass Fiduciary Group, LLC with non-disclosure language.

- 17. Jane Anne Geisler
- 18. Managed Protective Services, Inc.

Jane Anne Geisler and Managed Protective Services, Inc. ("MPS") applied for renewal of standard certification for the 2016-2018 renewal period and the 2018-2020 renewal period. There were pending complaints which precluded Division from presenting the applications for renewal. Division performed background investigations on all applications.

On the 2016-2018 the applicant answered "No" to the background history concerning civil suits. MPS was the Plaintiff in CC2016-088047. MPS was not paid for providing geriatric case management and sued for payment. The case was settled.

MPS responded that, "The inadvertent omission of this case on the renewal application was simply an oversight There was no intention of not disclosing these matters."

It is recommended renewal of standard licensure be granted to Jane Anne Geisler and Managed Protective Services, Inc. Fiduciary licenses for both renewal periods with Non-Disclosure Language for the 2018-2019 renewal period.

Agenda Summary - Tuesday, November 19, 2019

5) LICENSURE AND ELIGIBILITY

5-A: Review, discussion, and possible action regarding the voluntary surrender of licensure received from Donal Childers.

Donal Childers was granted licensure on March 2, 1999. On September 6, 2019 the Division received Mr. Childers' request to voluntarily surrender his license.

ACJA § 7-201(E)(7) reads:

A certificate holder in good standing may surrender their certificate to the board. However, the surrender of the certificate is not valid until accepted by the board. The board or division staff may require additional information reasonably necessary to determine if the certificate holder has violated any provision of the statutes, court rules and this section or the applicable section of the ACJA. The surrender does not prevent the commencement of subsequent discipline proceedings for any conduct of the surrendered certificate holder occurring prior to the surrender.

Division records indicate that there are no pending complaints against Mr. Childers.

It is recommended the Board accept the request of Donal Childers to voluntarily surrender his individual fiduciary license.

Agenda Summary - Tuesday, November 19, 2019

5) LICENSURE AND ELIGIBILITY

5-B: Review, discussion, and possible action regarding the request to retake the Fiduciary Program Examination from the following individuals:

Pursuant to ACJA § 7-201(E)(1)(f)(2)(d)(i) "Any applicant who was unsuccessful on the third attempt to pass the examination may request the Board for permission to sit for a fourth examination..."

1. Antoinette Nelson has participated in the examination on May 10, 2017, August 23, 2017 and December 6, 2017, obtaining scores of 62, 68 and 64 respectively.

By letter dated September 11, 2019, Ms. Nelson is requesting the Board's permission to sit for the examination for a fourth time.

2. Lorena Velasquez has participated in the examination on May 8, 2019, July 10, 2019 and September 11, 2019, obtaining scores of 49, 53 and 54 respectively.

By letter dated October 16, 2019, Ms. Velasquez is requesting the Board's permission to sit for the examination for a fourth time.